

REMARKS

This listing of claims will replace all prior versions and listings of claims in the application. No claims are added or cancelled in this response. Therefore claims 1, 4-7, 9, 10, 13-16, 19, 20, 24-26, 39-43, 46, 48-50, 52, and 53 are pending. Applicants respectfully request reconsideration of claims in view of the amendments.

CLAIM OBJECTIONS

Examiner objects to claim 48 because of informalities. Applicants make appropriate correction to claim 48. Accordingly, Applicants respectfully request the Examiner to withdraw the claim objection.

REJECTION UNDER 35 U.S.C. § 103(a)

- Examiner rejects claims 1, 4-6, 39-42, and 46 under 35 U.S.C. § 103(a) for allegedly being unpatentable over U.S. Patent No. 6,732,176 of Stewart (hereinafter "Stewart") in view of U.S. Patent No. 7,493,755 of Genty (hereinafter "Genty") and U.S. Patent No. 7,194,554 of Short (hereinafter "Short"). Office Action, p. 3, item 4.
- Examiner rejects claims 7 and 43 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Genty and Short, further in view of Funk Software, "Comprehensive RADIUS/AAA Solution for the global Enterprise", February 22, 2003, pages 1-6 (hereinafter "Funk"). Office Action, p. 9, item 5.
- Examiner rejects claim 48 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Genty and Short, further in view of U.S. Patent Application Publication No. 2002/0055924 of Liming (hereinafter "Liming"). Office Action, p. 10, item 6.
- Examiner rejects claims 9, 10, 13-16, 19, 24, and 52-53 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Genty and Short, further in view of U.S.

Patent Application Publication No. 2005/0149443 of Torvinen (hereinafter “Torvinen”). Office Action, p. 11, item 7.

- Examiner rejects claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Genty, Short and Torvinen, further in view of U.S. Patent Application Publication No. 2004/0255154 of Kwan (hereinafter “Kwan”). According to the Examiner, Office Action, p. 18, item 8.
- Examiner rejects claims 25 and 26 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Genty, Short and Torvinen, further in view of Funk. Office Action, p. 19, item 9.
- Examiner rejects claim 49 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Genty, Short, and Torvinen, and further in view of Liming. Office Action, p. 20, item 10.
- Examiner rejects claim 50 under 35 U.S.C. § 103(a) as being unpatentable over Stewart in view of Genty, Short, and Torvinen, and further in view of U.S. Patent Application Publication No. 2001/0045451 of Tan (hereinafter “Tan”). Office Action, p. 21, item 11.

Examiner rejects all pending claims in view of eight references. Applicants contend that all elements of amended claim 1, which is reproduced below, are still not disclosed by the cited references even with any combination of the eight references. M.P.E.P. § 2145, Part V. Independent claims 10 and 39 recite similar limitations as claim 1.

Claim 1 as amended recites the following:

A method of controlling access to a network, the method comprising:
 configuring an authentication server to include a first location information corresponding to **a combination of identities of a user station and of a mobile client**, the first location information being a location at which the mobile client is permitted to connect to the network,
 wherein the authentication server is coupled to the network and comprises a Remote Authentication Dial-In User Service (RADIUS) server having RADIUS attributes, and
 wherein the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes;
 requesting by a network switch the **combination of identities of the user station and of the mobile client** attempting to connect to the network;
 receiving, by the authentication server, the **combination of identities of the user station and of the mobile client** via the network switch;
 associating, by the network switch, a second location information corresponding to the mobile client with the **combination of identities of the user station and of the mobile client**, wherein the second location information indicates a location of the network switch coupled to the network to which the mobile client is attempting to connect;
 authenticating, by the authentication server, the **combination of identities of the user station and of the mobile client** received by the authentication server;
 comparing, by the authentication server, the second location information corresponding to the mobile client against the first location information from the VSA;
 deciding, by the authentication server, whether to grant or deny access to the network for the mobile client in response to authenticating the **combination of the identities of the user station and of the mobile client**, wherein the deciding is in response to comparing the second location information against the first location information; and
 informing the network switch by the authentication server whether to grant or deny access to the network for the mobile client.

The claim amendments are supported by the Specification. See, for example, Application Specification, p. 9, lines 12 to 14; p. 10, lines 7-9.

“**All words in a claim must be considered** in judging the patentability of that claim against the prior art.” *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). M.P.E.P. § 2143.03 (emphasis added).

Examiner admits that Stewart does not disclose that the authentication server is coupled to the network and comprises a RADIUS server. Office Action, p. 5. Examiner further admits that Stewart does not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes. Id. To cure these deficiencies, Examiner relies on Genty and Short. Id.

Regarding Genty, Examiner implicitly admits the Genty does not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes. To cure that specific deficiency, Examiner relies on Short. Id.

Applicants contend that neither Genty nor Short, alone or in combination, cure the deficiencies of Stewart for at least the following reasons.

Genty allegedly discloses a user registry for a network access authentication server such as a RADIUS server, which is configured to hold a user's private key and the users public key certificate. Genty, Col. 3, lines 11-13 “Summary of the Invention.” The section of Genty cited by the Examiner (Col. 12, lines 30-44), however, does not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes as recited by claim 1. Instead, the cited section of Genty states:

Assuming that the user requires access to the grid, the network access authentication server generates a proxy certificate (step 406) in a manner similar to that described above; **the proxy certificate contains some information that has been copied from the user's public key certificate**, e.g., the "Subject" identifier, and the proxy certificate is digitally signed with the user's private key. The network access

authentication server then returns the proxy certificate along with the network access parameters (step 408), thereby concluding the integrated authentication process. For example, a RADIUS server with extended functionality, **such as the grid proxy certificate generator function as shown in FIG. 2B, is able to return the proxy certificate within vendor-specific attributes (VSA) that allow vendors to support extended attributes within the RADIUS protocol.** (emphasis added)

The above disclosure of Genty only discloses that the grid proxy certificate generator function as shown in FIG. 2B of Genty, is able to return the proxy certificate within vendor-specific attributes (VSA) that allow vendors to support extended attributes within the RADIUS protocol. This grid proxy certificate is not the first location information which is included within the VSA. Instead, the grid proxy certificate of Genty contains some information that has been copied from the user's public key certificate, e.g., the "Subject" identifier, and the proxy certificate is digitally signed with the user's private key. The "Subject" identifier of Genty is not the first location information which is included within a VSA.

Claim 1 specifically recites that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes and Examiner is respectfully requested to follow M.P.E.P. § 2143.03—"All words in a claim must be **considered** in judging the patentability of that claim against the prior art." Simply because some information (a grid proxy certificate of Genty) is associated with the VSA of RADIUS of Genty, does not mean that the specific information of the first location is included in the VSA attribute of RADIUS attributes as recited by claim 1. Furthermore, Genty provides no motivation or suggestion that the VSA of its RADIUS server is configured to hold the specific information of the first location at which the mobile client is permitted to connect to the network as recited by claim 1.

Applicants further contend that Short does not cure the above deficiency of Genty. Short allegedly discloses systems and method for selectably controlling and customizing source access to a network. Short, Abstract. The cited sections of Short do

not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes as recited by claim 1. Indeed, the term “VSA” or “vendor” does not even appear anywhere in Short. Without any disclosure of the term “VSA” in Short, Short falls short of any ability to render the above limitation obvious.

As mentioned above, Genty’s use of the VSA with a grid proxy certificate has nothing to do with including the first location at which the mobile client is permitted to connect to the network. Accordingly, the alleged VSA of Genty cannot be used to store the alleged source profile of Short. In the absence of any VSA usage model in Short, there is simply no suggestion or motivation to place any location information from the alleged source profile of Short to a non-disclosed VSA of the RADIUS server of Short.

Nevertheless, to further prosecution of this matter, Applicants amend the identity to be authenticated in claim 1 to be a combination of identities of a user station and of the mobile client. Such combination of identities is not disclosed by any of the references. The cited references at best disclose a single identity which is the identity of the to-be authenticated user. Based on the above limitation, claim 1 is not obvious by Stewart, Genty, and Short. Independent claims 10 and 39 recite similar limitations as claim 1. The remaining claims depend from independent claims 1, 10, and 39 and include all limitations of their respective independent claims.

“If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).” M.P.E.P. § 2143.03.

Accordingly, Applicants respectfully request reconsideration of all pending claims.

The remaining references are cited for dependent claims. Applicants contend that the remaining references do not cure the above deficiencies of Stewart, Genty, and Short.

Funk allegedly discloses a RADIUS/AAA server (Funk, p.1), however, it does not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes as recited by claim 1. Furthermore, Funk does not disclose the identity to be authenticated is a combination of identities of the user station and of the mobile client.

Liming allegedly discloses a software and hardware architecture operating across a local or wide area network providing an integral spatial location context. Liming, Abstract. Examiner admits in the previous Office Action that Liming does not disclose a RADIUS server. Final Office Action, pp. 11-12 (mailed 05/25/2010). This means that Liming cannot disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes as recited by claim 1. Furthermore nothing in Liming suggests that the identity to be authenticated is a combination of identities of the user station and of the mobile client.

Torvinen allegedly discloses a method and system to allow management of restricted group access based upon credentials associated with network terminals. Torvinen, Abstract. However, Torvinen does not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes. Furthermore, Torvinen does not disclose the identity to be authenticated is a combination of identities of the user station and of the mobile client.

Kwan allegedly discloses “a multiple key, multiple tiered network security system, method and apparatus [that] provides at least three levels of security.” Kwan Abstract. Kwan allegedly discloses an authentication sever 106 that comprises a server that uses the RADIUS for performing user authentication. Id. at par. [0033]. However,

Kwan does not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes. Furthermore, Kwan does not disclose the identity to be authenticated is a combination of identities of the user station and of the mobile client.

Tan allegedly discloses a “method and system for token based user access authentication [that] enables secure user access to a web server using a token, such as a smart card, and [that] provides a single sing-on mechanism which does not employ a user name and password in the log on process.” Tan, Abstract. However, Tan does not disclose that the first location information is included within a RADIUS vendor specific attribute (VSA) of the RADIUS attributes. Furthermore, Tan does not disclose the identity to be authenticated is a combination of identities of the user station and of the mobile client.

Based on the above arguments, claim 1 is not obvious by the cited references. Independent claims 10 and 39 recite similar limitations as claim 1. The remaining claims depend from independent claims 1, 10, and 39 and include all limitations of their respective independent claims. M.P.E.P. § 2143.03.

Applicants respectfully request reconsideration of all pending claims and respectfully request the Examiner to allow all pending claims based on the amendments and arguments.

CONCLUSION

Applicants submit that they have overcome Examiner's objections to and rejections of the claims and that they have the right to claim the invention as listed in the listing of claims. Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Pursuant to 37 C.F.R. § 1.136(a)(3), Applicants request and authorize the U.S. Patent and Trademark Office to (1) treat any concurrent or future reply that requires a petition for extension of time as incorporating a petition for extension of time for the appropriate length of time and (2) charge all required fees, including extension of time fees and fees under 37 C.F.R. § 1.16 and § 1.17, to Deposit Account No. 02-2666.

Respectfully submitted,
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I hereby certify that this correspondence is being submitted electronically via EFS Web on the date shown below.

Date: January 19, 2011

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